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BY ECF

Application granted.

April 13, 2021

SO ORDERED:

The Honorable William H. Pauley III  
United States District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

  
WILLIAM H. PAULEY III  
U.S.D.J.

Re: *United States v. Daniels*, 19 Cr. 931-WHP-3 (S.D.N.Y.)

April 14, 2021

Dear Judge Pauley:

We represent Defendant Quinteria Daniels in the above-captioned case. We write to request, with the consent of the Government and Pre-Trial Services, a modification of Ms. Daniels's conditions of release, as described below. On November 25, 2019, Ms. Daniels was ordered released on a \$50,000 Appearance Bond to be secured by two financially responsible persons. Among other conditions of her release, Ms. Daniels was subject to a restriction limiting her travel to the Southern and Eastern Districts of New York and the District of New Jersey. On August 27, 2020, Ms. Daniels's bail was modified to include home detention in Harrisburg, Pennsylvania. On April 7, 2021, Ms. Daniels was sentenced to 6 months' incarceration, which will begin August 25, 2021.

We respectfully request that Ms. Daniels's home detention be modified to allow for a set schedule that specifies the times she can leave her house each day to take her daughter to school, attend doctor's appointments, and go to work. Ms. Daniels plans to continue working until the first week of May then return to work after she has recovered from giving birth and work until her surrender date.

Additionally, we respectfully request that Ms. Daniels's monitor be removed immediately and remain off until her doctor confirms it can be put back on. Ms. Daniels is experiencing abnormal swelling and leakage in her leg and foot, and needs an MRI for further diagnosis. Her doctor also wants to perform an MRI and CAT Scan before her C-section procedure in May to confirm that she and her baby are healthy and ready for the procedure. The C-section is tentatively scheduled for the week of May 7th, but will depend on the results of the tests.

April 13, 2021

The Honorable William H. Pauley III

We have conferred with Assistant U.S. Attorney Rebecca Dell and Ms. Daniels's Pretrial Officer in Pennsylvania, who have advised that they consent to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Brooke Cucinella

Brooke Cucinella

cc: AUSA Rebecca Dell